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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW HAMPSHIRE

In re

Shannon Michael Mollohan, Debtor Bk. No. 19-11009-BAH

Chapter 13

DEBTOR'S MOTION TO RECLAIM INTERPLED FUNDS

NOW COMES Debtor Shannon M. Mollohan, by his attorney, Randall B. Clark, to move the Court to return to him the funds that the Chapter 13 Trustee interpled to the Court on May 3, 2021.

- In January 2021 undersigned counsel ("Clark") received from the Chapter 13

 Trustee two checks, one for \$6,580.38, the other for \$364.50, representing a refund of the sums that Debtor had paid to Trustee over the course of Debtor's bankruptcy.
- 2. Through sloth and neglect, Clark failed to convey the checks to Debtor. This failure was in no way Debtor's fault.
- 3. On Saturday, May 1 Clark received via USPS a copy of Trustee's affidavit dated April 29. On Monday, May 3, before Clark had opportunity to respond, Trustee interpled \$6,944.88.
- 4. Debtor desires that these funds be returned to him. Clark also desires that Debtor receive his money.

WHEREFORE, Debtor Shannon Michael Mollohan requests that the Court return to him the \$6,944.88 that Trustee tendered to the Court on May 3, 2021.

Respectfully submitted, SHANNON MICHAEL MOLLOHAN, By his attorney,

Date: May 13, 2021 /s/ Randall B. Clark

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